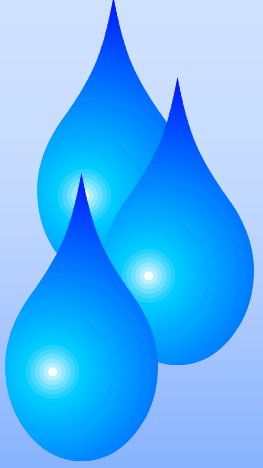


Guiding Principles of SSO Prevention & Key Elements of Effective SSOPPs

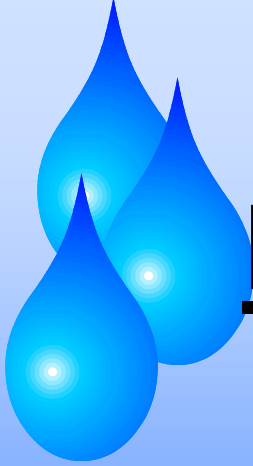
Chiara Clemente
San Diego Regional Water Quality Control Board
May 20, 2003



Overview



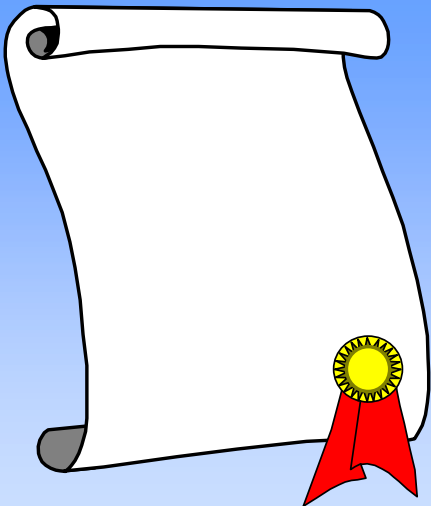
- Zero spills requirement
- Focus on prevention
- Sanitary Sewer Overflow Prevention Plan (SSOPP) is key
- Continuous review and update using proper criteria



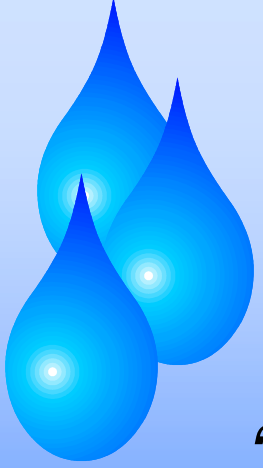
Background...Order No. 96-04

***General Waste Discharge Requirements
Prohibiting Sanitary Sewer Overflows
by Sewage Collection Agencies***

→ 48 cities and special districts



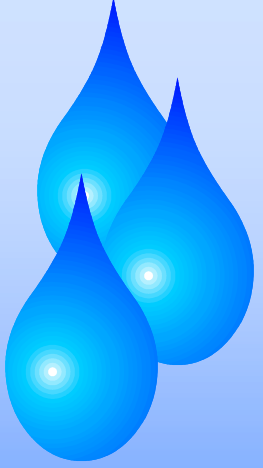
- Prohibition***
- Requirements***
- Reporting***
- Enforcement***



PROHIBITION

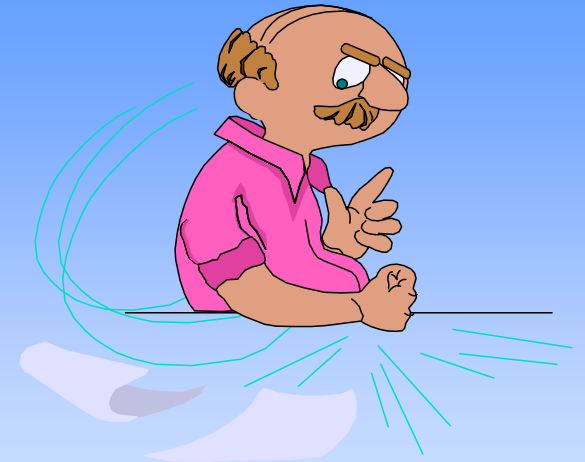
“The discharge of sewage from a sanitary sewer system at any point upstream of a sewage treatment plant is prohibited.”

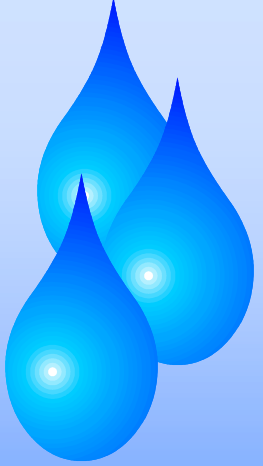




REQUIREMENTS

- ***Control, terminate, recover SSOs***
- ***Take corrective actions***
- ***Maintain SSO Response Plan***
- ***Maintain SSO Prevention Plan***
- ***Maintain records***
- ***Allow RWQCB inspections***





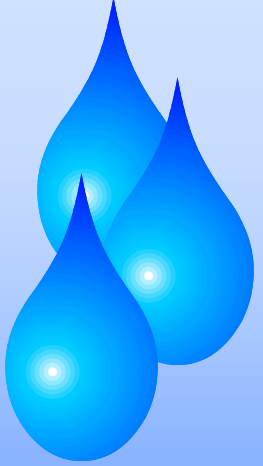
ENFORCEMENT

TYPES

- ***Notice of Violation (NOV)***
- ***Request for Technical Information (13267)***
- ***Cleanup And Abatement Orders***
- ***Cease And Desist Orders***
- ***Referral to AG or DA***
- ***Administrative Civil Liabilities***

PURPOSE

- ***Address incidence of actual or threatened non-compliance***
- ***Bring violation to discharger's attention***
- ***Give discharger opportunity to correct violation***
- ***Deterrence***
- ***Polluters do not gain an economic advantage***
- ***Compensation for environmental damage***

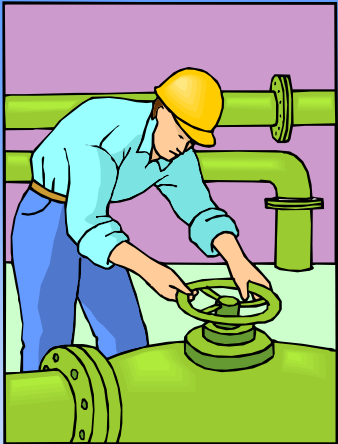


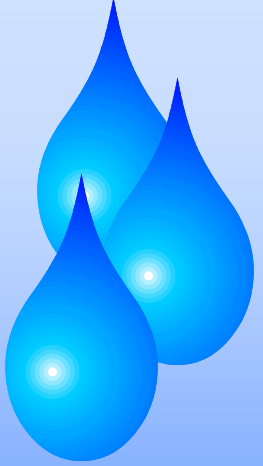
SSO Prevention Plan



Document designed to
prevent **SSOs** or minimize
potential

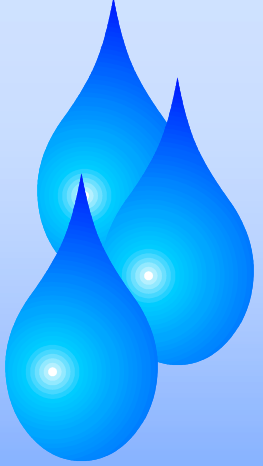
- ***Inspection schedules***
- ***Maintenance/cleaning schedules***
- ***Grease control program***
- ***System upgrades***
- ***Capacity assurance***



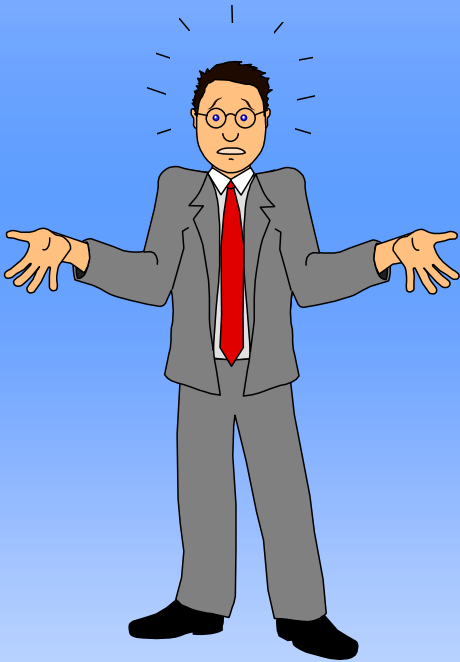


Elements of an Effective SSOPP

- **Current-** up to date and in place (i.e., in main office, in lift stations, in satellite sanitary offices, in hands of field personnel and in their vehicles.)
- **Customized-** regarding agency's specific customer base, infrastructure and geographic considerations
- **Corrective-** eliminate root cause of problems and anticipate potential future problem areas
- **Coordinated-** as needed with key stakeholders such as cities/agencies to effectively address problems of grease, roots, private sewer laterals, spill containment & recovery

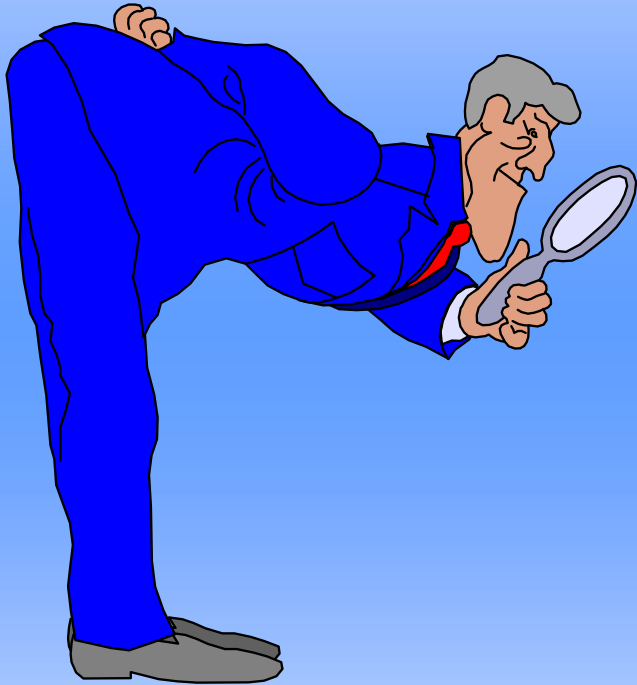


How?- Focus on Prevention

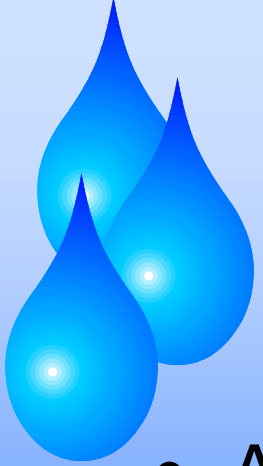


- Almost every spill can be prevented!
- Historically, sewer spill reports have focused on response actions
- Shift focus to prevention
 - When revising SSOPPs
 - When writing spill reports

Preventative Measures & Spill Reporting



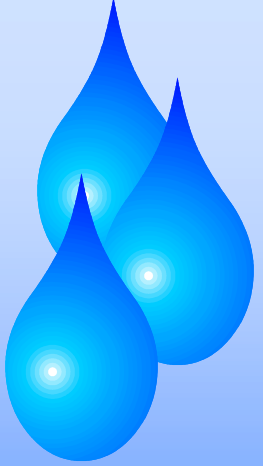
- How could this spill have been prevented?
- Is it realistic? If not, why not?
- Do you see any recurring trends?



Measures of Effectiveness

- Are the numbers of spills decreasing?
- Are you allocating enough resources?
- In the best way possible?

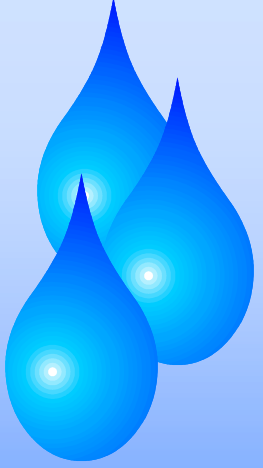




Summary...

- **Zero spills...**
- **By prevention...**
- **SSOPP is the key...**
- **Evaluate early and often!**

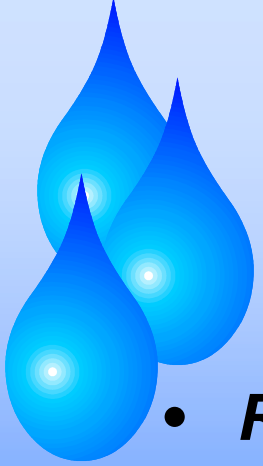
- **And always be looking ahead...**



Looking & thinking ahead...

- Leaking laterals
- Stream diversions
- CMOM





For more information...

- ***RWQCB, Order No. 96-04 ,SSOs***

<http://www.swrcb.ca.gov/rwqcb9/Programs/SSO/sso.html>

- ***US EPA, SSO Rule, CMOM***

<http://cfpub.epa.gov/npdes/sso/ssorule.cfm>

- ***RWQCB Contact***

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